

# Exhibit 20

DIANE E. PRITCHARD (State Bar No. 96999)  
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*Counsel for Indirect Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Case No. 3:07-cv-5944  
MDL No. 1917

**CLASS ACTION**

This Document Relates to:  
All Indirect Purchaser Actions

**DECLARATION OF DIANE E. PRITCHARD  
IN SUPPORT OF PLAINTIFFS'  
APPLICATION FOR ATTORNEYS' FEES,  
EXPENSES AND INCENTIVE AWARDS**

Judge: Honorable Samuel Conti  
Courtroom One, 17th Floor

1 I, Diane E. Pritchard, declare as follows:

2 1. I am an attorney licensed to practice before the courts of the State of California, am  
3 admitted to the bar of this Court, and am a partner in the law firm Vogl Meredith Burke LLP. I  
4 have personal knowledge of the facts stated in this declaration and, if called as a witness, I could  
5 and would testify competently to them. I make this declaration in support of my firm's request for  
6 attorneys' fees and reimbursement of litigation expenses, as set forth in Plaintiffs' Application for  
7 Attorneys' Fees, Expenses and Incentive Awards.

8 2. I and my firm have worked on this case on behalf of the Indirect Purchaser  
9 Plaintiffs ("IPPs") under the direction of and at the request of Mario Alioto, of Trump, Alioto,  
10 Trump & Prescott, LLP, Lead Counsel for the IPPs. My professional profile is attached as Exhibit  
11 1 and incorporated herein by reference.

12 3. Throughout the course of this litigation, my firm kept files contemporaneously  
13 documenting all time spent, including tasks performed, and expenses incurred, and transmitted  
14 those reports on a regular basis to Lead Counsel. All of the time and expenses reported by my firm  
15 were incurred for the benefit of the IPPs.

16 4. During the course of this litigation, I have been involved in the following tasks and  
17 activities on behalf of the IPPs, all of which work was assigned and/or approved by Lead Counsel.  
18 I was the primary attorney for the IPPs assigned to take the merits depositions of two defendant  
19 groups, the Philips defendants and the LG defendants (and LPD). In that role, I took or  
20 participated in the taking of at least 14 depositions of current or former Philips, LG, and LPD  
21 employees. The majority of the depositions were taken in Washington, D.C. Others of these  
22 depositions were conducted in San Diego, Cabo San Lucas, Mexico, and Newcastle, England. I  
23 also prepared to take the deposition of a witness, in the Netherlands, whose deposition had not  
24 been able to be obtained as of the time of the IPPs' settlements. I participated in the preparation  
25 for the deposition of a Samsung SDI witness (which was taken in Korea). I conducted interviews  
26 of LG witnesses, pursuant to the terms of the cooperation provision of the IPPs' settlement with  
27 LG. I propounded written discovery requests to Philips and participated in meet and confer efforts  
28



1 regarding Philips' responses. I participated in drafting the opposition to Philips defendants'  
2 summary judgment motions. I participated in the briefing regarding the California Attorney  
3 General's settlement of parens patriae claims against the Philips defendants in a state court  
4 proceeding and its impact on the certified IPP class in this action. I analyzed the Philips, LG, and  
5 LPD witnesses' testimony, and related exhibits, for use at trial. I prepared designations of Philips  
6 and LG witnesses' depositions for use at trial, analyzed Philips' and LG's designations and  
7 objections to designations, and prepared counterdesignations in response, as well as serving as a  
8 resource for other team members' questions regarding designations of testimony and exhibits. I  
9 participated in drafting oppositions to defendants' motions in limine.

10         5.       The schedule attached as Exhibit 2, and incorporated herein, is a detailed summary  
11 of the amount of time spent by my firm's partners, attorneys and professional support staff who  
12 were involved in this litigation. It does not include any time devoted to preparing this declaration  
13 or otherwise pertaining to the Joint Fee Petition. The lodestar calculation is based on my firm's  
14 historical billing rates in effect at the time services were performed. Exhibit 2 was prepared from  
15 contemporaneous time records regularly prepared and maintained by my firm. Those records have  
16 been provided to Lead Counsel and I authorize them to be submitted for inspection by the Court if  
17 necessary. The hourly rates for my firm's partners, attorneys and professional support staff  
18 included in Exhibit 2 were at the time the work was performed the usual and customary hourly  
19 rates charged for their services in similar complex litigation.

20         6.       The total number of hours reasonably expended on this litigation by my firm from  
21 inception to May 31, 2015 is 1470.4 hours. The total lodestar for my firm at historical rates is  
22 \$769,320. The total lodestar for my firm at current rates is \$769,320. Expense items are billed  
23 separately and are not duplicated in my firm's lodestar.

24         7.       The expenses my firm incurred in litigating this action are reflected in the books  
25 and records of my firm. These books and records are prepared from expense vouchers, invoices,  
26 receipts, check records and other source materials and accurately reflect the expenses incurred.  
27 My firm's expense records are available for inspection by the Court if necessary.  
28

1           8.       My firm incurred a total of \$14,218.73 in unreimbursed expenses, all of which were  
2 reasonable and necessary for the prosecution of this litigation. This was for non-common  
3 litigation expenses incurred by my firm, such as travel, meals and lodging, and copying. A  
4 summary of those expenses by category is attached as Exhibit 3.

5  
6           I declare under penalty of perjury that the foregoing is true and correct. Executed this 17<sup>th</sup>  
7 day of July, 2015, in San Francisco, California.

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9 Diane E. Pritchard

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**EXHIBIT 1**

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## DIANE PRITCHARD

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Ms. Pritchard is a partner at Vogl Meredith Burke LLP, a litigation firm in San Francisco. She has a broad federal and state litigation practice with a focus on complex business disputes, antitrust, and class actions. Ms. Pritchard has substantial trial experience and has handled numerous appeals in the California Court of Appeal, the Ninth Circuit Court of Appeals, and the U.S. Supreme Court. A representative selection of matters Ms. Pritchard has handled includes:

- Lead counsel for major energy company in antitrust litigation and nationwide class actions involving the natural gas and electricity industries, including alleged price-fixing in the natural gas market, in multidistrict litigation and in state and federal courts in California, Arizona, Nevada, Oregon, Washington, Colorado, Missouri, Wisconsin, Tennessee, and Kansas, including obtaining summary judgment.
- Successfully defended paper manufacturer in nationwide class actions in multidistrict proceedings and various state courts involving alleged price-fixing cartel in the market for publication paper.
- Represented insurance company in class action litigation alleging fraud in the marketing of variable rate premium insurance policies.
- Represented large bookselling chain in litigation brought by national association of independent booksellers involving federal and state antitrust and unfair competition claims.
- Represented major energy company in multiple class action suits, and actions by the Attorneys General of Nevada, Oregon, and Washington, various municipalities and counties, the Governor of California, and investor owned utilities regarding allegations of withholding capacity on major interstate natural gas pipeline into California.
- Successfully represented major electronics manufacturers in antitrust litigation regarding standards setting.
- Successfully represented largest worldwide manufacturer of produce labeling systems in patent and antitrust litigation.
- Antitrust counseling and advice for major professional association.
- Lead counsel for major energy company in action by City of Tacoma, Washington, and California class actions alleging price fixing and antitrust conspiracy to manipulate Western electricity markets.
- Successfully defended major accounting firm at the trial and appellate court levels in a series of securities class actions.
- Represented major medical device manufacturer in antitrust claims arising in patent litigation.
- Represented major securities firm in a series of cases involving broker misconduct.
- Represented developer in land use, regulatory, and environmental challenges to a major commercial and residential real estate development.
- Successfully defended a major public university at the trial and appellate court levels in class action involving its pension plan and early retirement benefits.
- Represented insurer in the trial court and on appeal in numerous environmental coverage actions.

Ms. Pritchard received her law degree, cum laude, from New York University School of Law in 1980, where she was Order of the Coif and Editor-in-Chief of the New York University Law Review. Upon graduation, she served as a law clerk to the Honorable James L. Oakes of the United States Court of Appeals for the Second Circuit. She has been named a Super Lawyer in Antitrust and is AV-rated by Martindale-Hubbell.

Ms. Pritchard has previously been a Partner and Of Counsel at Morrison & Foerster LLP (1998-2009), Special Counsel at O'Melveny & Myers LLP (1994-1998), and a Partner at Pritchard, Fields & Jaffe (1987-1994).



**EXHIBIT 2**

Firm Name	Vogl Meredith Burke LLP			
Reporting Year	2013			

[illegible]

## EXHIBIT 2

## IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

## TIME AND LODESTAR SUMMARY

## INDIRECT PURCHASER PLAINTIFFS

Firm Name	Vogl Meredith Burke LLP		
Reporting Year	2014		

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Diane E. Pritchard (P)	\$ 525.00				9.6	317.8	262.0		1.4		137.4		12.3	740.5	\$ 388,762.50
Morgan Bennet (PL)	\$ 125.00					5.1								5.1	\$ 637.50
														0.0	\$ -
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		0.0	0.0	0.0	9.6	322.9	262.0	0.0	1.4	0.0	137.4	0.0	12.3	745.6	\$ 389,400.00

Firm Name	Vogl Meredith Burke LLP			
Reporting Year	2015			

[illegible]



## EXHIBIT 2

## IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

## TIME AND LODESTAR SUMMARY

## INDIRECT PURCHASER PLAINTIFFS

Firm Name	Vogl Meredith Burke LLP		
Reporting Year	Inception through Present		

Year		1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
2007		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2008		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2009		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2010		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2011		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2012		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2013		0.0	1.8	0.0	0.0	314.9	144.1	0.0	0.0	0.0	41.8	0.0	0.0	502.6	\$ 263,265.00
2014		0.0	0.0	0.0	9.6	322.9	262.0	0.0	1.4	0.0	137.4	0.0	12.3	745.6	\$ 389,400.00
2015		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	26.7	0.0	195.5	222.2	\$ 116,655.00
		0.0	1.8	0.0	9.6	637.8	406.1	0.0	1.4	0.0	205.9	0.0	207.8	1470.4	\$ 769,320.00

## STATUS:

(P) Partner  
 (OC) Of Counsel  
 (A) Associate  
 (LC) Law Clerk  
 (PL) Paralegal  
 (I) Investigator

## CATEGORIES:

1 Attorney Meeting/Strategy  
 2 Court Appearance  
 3 Client Meeting  
 4 Draft Discovery Requests or Responses  
 5 Deposition Preparation  
 6 Attend Deposition - Conduct/Defend  
 7 Document Review  
 8 Experts - Work or Consult  
 9 Research  
 10 Motions/Pleadings  
 11 Settlement  
 12 Trial

**EXHIBIT 3**

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## EXHIBIT 3

## IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

## EXPENSE SUMMARY

## INDIRECT PURCHASER PLAINTIFFS

Firm Name	Vogl Meredith Burke LLP
Reporting Year	Inception through Present

TYPE OF EXPENSE		TOTAL
Assessments		
Outside Copies		
In-house Reproduction /Copies		\$ 11.50
Court Costs & Filing Fees		\$ 44.00
Court Reporters 7 Transcripts		
Computer Research		
Telephone & Facsimile		
Postage/Express Delivery/Courier		\$ 420.71
Professional Fees (investigator, accountant, etc.)		
Experts		
Witness / Service Fees		
Travel: Airfare		\$ 5,718.69
Travel: Lodging/Meals		\$ 6,851.92
Travel: Other		\$ 9.95
Car Rental/Cabfare/Parking		\$ 1,161.96
Other Expenses		
		\$ 14,218.73